

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Vanky Bernadeau, as next friend and guardian
of C.B., a minor

Plaintiff(s),

-against-

The City of New York, et al.

Defendant(s).

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**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

25 Civ. 483 (NRM) (VMS)

The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s): Gideon Oliver

For Defendant(s): Gregory Accarino (for Defendant City) Doug LaBarbera (for Defendants Mayfield and Meneses)

A. Do the parties request referral to the Court's ADR program? Yes: ☐ No: ☒

B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?

Yes: ☐ If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.

No: ☒ If no, do not indicate which party declines consent.

C. The parties may wish to engage in settlement discussions.

If so, Plaintiff(s) will serve demand by **TBD**. Defendant(s) will respond by **TBD**.
Defendant City answered on 5/28/25

D. Defendant(s) will answer or otherwise respond to complaint by , if not yet done.

Individual Defendants answered on 7/3/25

The parties will serve Rule 26(a)(1) initial disclosures by **7/15/2025**, if not yet done.

The parties will serve initial document requests and interrogatories on or before **8/25/2025**.

Any joinder and/or amendments of the pleadings must be made by **10/15/2025**.

The parties will complete fact discovery by **1/16/2026**

If the parties perform expert discovery, they will serve initial disclosures by ; and rebuttal expert reports on or before
initial expert reports by ; and the parties
All discovery, including expert depositions, will be completed by , and the parties
will file a joint letter certifying the close of all discovery by this same date.

**Expert discovery to be
revisited by parties at close
of fact discovery**

Other considerations the parties wish to bring to the Court's attention, such as the need for electronic discovery or confidentiality order:

Potential Confidentiality Order